

Exhibit D

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13 **UNITED STATES DISTRICT COURT**
14 **NORTHERN DISTRICT OF CALIFORNIA**

15 RICHARD KADREY, et al.,
16 Individual and Representative Plaintiffs,
17 v.
18 META PLATFORMS, INC., a Delaware
19 corporation;
20 Defendant.

Case No. 3:23-cv-03417-VC

**DEFENDANT META PLATFORMS, INC.'S
RESPONSES AND OBJECTIONS TO
PLAINTIFFS' FIRST SET OF
INTERROGATORIES**

Trial Date: None
Date Action Filed: July 7, 2023

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INTERROGATORY NO. 5:

Identify all Agreements between and among:

- a. You and anyone associated, affiliated, or having any connection with data used to train the Meta Language Models;
- b. You and directors and officers of Defendants or Related Entities with a more than five percent interest held by directors and officers of Defendants.

RESPONSE TO INTERROGATORY NO. 5:

Meta incorporates by reference its objections and definitions above, including to the terms “Meta Language Models,” “You,” and “Training Data.”

As an initial matter, Meta objects to this Interrogatory because it consists of two Interrogatories, which count toward Plaintiffs’ limit. In answering the Interrogatory, Meta does not waive this objection.

Meta objects to this Interrogatory as vague, ambiguous, and unintelligible as to the phrase “any connection with data.” Meta is accordingly unable to respond to subpart (a) as written.

Meta objects to this Interrogatory as vague, ambiguous, and unintelligible as to “Defendants,” as Meta is the only named defendant in this case. Meta will interpret “Defendants” to mean Meta (as construed above).

Meta objects to this Interrogatory as vague, ambiguous, and unintelligible as to the term “Related Entities,” which is capitalized as if it is defined when it is not. For purposes of this response, Meta will construe “Related Entities” to mean entities owned by or sharing common ownership with Meta.

Meta objects to this Interrogatory on the ground that it is overbroad, unduly burdensome, and disproportionate to the needs of the case and seeks information that is not relevant to the parties’ claims and defenses, in particular to the extent it seeks information concerning “all” such agreements regardless of their subject matter having “any connection” with “data.” Meta will construe subpart (a) to refer to formal, written agreements concerning licensing or acquisition of training data for any Meta Language Model (as construed above). Meta will not respond to subpart (b).

Subject to and without waiving the foregoing objections, and pursuant to the terms of the Protective Order and the ESI Order, Meta responds as follows:

Meta incorporates by reference its most recent SEC FORM DEF 14A, which identifies individuals and companies with a beneficial interest of more than 5% of Meta’s publicly traded stock. Meta will produce a copy of that document in its forthcoming production pursuant to Rule 33(d).

Pursuant to Rule 33(d), Meta will also conduct a reasonable search for and produce on a rolling basis documents sufficient to show any executed written agreements concerning licensing or acquisition of training datasets for any Meta Language Models (as construed above).

INTERROGATORY NO. 6:

In order of corporate seniority, Identify by name and date all Your past and present directors, officers, and board members.

RESPONSE TO INTERROGATORY NO. 6:

Meta incorporates by reference its objections and definitions above, including to the term “Your.”

Meta objects to the portion of this Interrogatory requiring Meta to list individuals by order of “corporate seniority,” as certain individuals may be of equivalent or otherwise indistinguishable seniority.

Meta objects to this Interrogatory as overbroad, unduly burdensome, and disproportionate to the needs of the case and seeks information that is not relevant to the parties’ claims and defenses, in particular to the extent it seeks information concerning all past and present directors, officers, and board members of Meta, irrespective of the time period relevant to Plaintiffs’ allegations, or the role of said individuals in the conduct at issue in Plaintiffs’ complaint, which concerns language models that were only recently released.

Meta will not respond to this Interrogatory. Meta instead refers Plaintiff to the Investor Relations (<https://investor.fb.com/home/default.aspx>) and Company Info (<https://about.meta.com/company-info/>) pages on its website, which contain information about present Meta leadership.

INTERROGATORY NO. 7:

In order of corporate seniority, Identify by name, job title, and date, all Persons, Including employees from other businesses, contractors, vendors, and other non-employees of Your business, previously and currently responsible for, or having oversight or control over the training, engineering, development, ethics, safety, or alignment of the Meta Language Models, and any iterations, versions, or variations thereof. Include in Your response: